GMDSS Task Force 1600 North Oak Street; #427 Arlington VA 22209

Before The FEDERAL COMMUNICATIONS COMMISSION Washington, D. C. 20554

In the Matter of

Amendment of the Commission's) DA 07-4212 Procedures) WT 07-230 Regarding Management of Maritime Mobile Service Identities (MMSI)

COMMENTS OF THE TASK FORCE FOR THE IMPLEMENTATION OF THE GLOBAL MARITIME DISTRESS AND SAFETY SYSTEM (GMDSS)

The GMDSS Implementation Task Force respectfully submits these Comments in response to Public Notice No. DA 07-4212 released October 11, 2007.

The GMDSS Task Force was chartered by the U.S. Coast Guard to supplement government functions through outreach to the private sector and recommendation to regulatory authorities. The Task Force membership is broad based including over 1600 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities. The Task Force maintains a website at www.navcen.uscg.gov/marcomms which contains

numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action, and comments to pending regulatory proceedings.

MMSI Numbers are Used in Both AIS and DSC Applications

As noted in the Task Force response to the FCC Inquiry on Maritime Automatic Identification Systems (AIS) (See Task Force response to DA 07-2597 of 5 July 2007), and also in the Petition, MMSI Numbers are used to identify users of both Digital Selective Calling (DSC) radios and AIS units. It is therefore vital that the MMSI database accuracy be assured for both National Security and Search and Rescue applications.

GMDSS Task Force is Petitioner in This Proceeding

As Petitioner is this proceeding, the Task Force wishes to reaffirm the position stated in the Petition and note that the Task Force has met twice since filing the Petition on 21 May 2007. As its most recent meeting on 19 October 2007, the Task Force reaffirmed its position and approved this response.

For the GMDSS Task Force

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